

Title VI Implementation Plan

Title VI of the Civil Rights Act of 1964

**Montgomery County Department of Transportation**

**Division of Transit Services**



FY 2021-2023 Title VI Program Update

**Adopted date**

**To be determined 2020**

## Contents

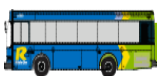
I. INTRODUCTION .....	1
II. OVERVIEW OF SERVICES .....	2
III. POLICY STATEMENT AND AUTHORITIES .....	8
IV. ORGANIZATION .....	10
V. OVERALL TITLE VI PROGRAM RESPONSIBILITIES .....	10
VI. PUBLIC OUTREACH AND INVOLVEMENT .....	14
VII. ENVIRONMENTAL JUSTICE (for All Construction Projects) .....	16
VIII. URBANIZED AREA CHECKLIST .....	18
IX. SERVICE DELIVERY AND PLANNING .....	19
X. Appendices .....	21
Appendix A – Title VI Assurances, Policy and Notice .....	21
Appendix B – Title VI Complaint Procedures and Form .....	24
Appendix C – Description of Title VI Investigations, Lawsuits and Complaints .....	29
Appendix D – Public Participation Plan .....	30
Appendix E – Language Assistance Plan .....	31
Appendix F – Minority Representation on Ride On Advisory Committees – July 2020 .....	32
Appendix G – Title VI Policies .....	32
Appendix H – Title VI Policies Summary of Public Involvement Activities .....	36
Appendix I – Fare and Major Service Changes – 2018 to 2020 .....	42
Appendix J - Title VI Monitoring Report .....	43
Appendix K - Non-discrimination Contract Clauses .....	44
Appendix L - FY21-22 Annual Transportation Plan Assurance .....	45



Appendix M - FY21-22 Annual Transportation Plan Reporting Form ..... 46

Appendix N - Montgomery County Council Approval ..... 47

DRAFT



## I. INTRODUCTION

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving federal financial assistance. Specifically, Title VI provides that "no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance." (42 U.S.C. Section 2000d).

The Civil Rights Restoration Act of 1987 clarified the intent of Title VI to include all program and activities of Federal-aid recipients, sub-recipients, and contractors whether those programs and activities are federally funded or not.

Recently, the Federal Transit Administration (FTA) has placed renewed emphasis on Title VI issues, including environmental justice in the transportation planning and programming, and providing meaningful access to persons with Limited English Proficiency.

Recipients of public transportation funding from FTA and the Maryland Department of Transportation Maryland Transit Administration (MDOT MTA) are required to develop policies, programs, and practices that ensure that federal and state transit dollars are used in a manner that is nondiscriminatory as required under Title VI.

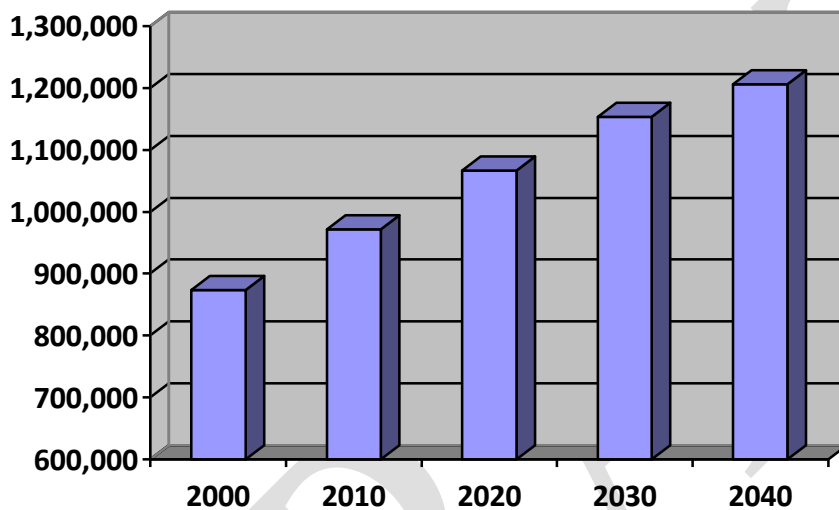
This document details how Montgomery County, Maryland incorporates nondiscrimination policies and practices in providing services to the public.



## II. OVERVIEW OF SERVICES

Montgomery County is a Maryland suburb of Washington, DC located to the northwest of Washington, DC. It has been the most populous Maryland county since 1990 with a 2019 population of 1,050,668 – an 8.2 percent increase over the 2010 census figures.<sup>1</sup> Within the Washington, DC region the County's population ranks second behind Fairfax County, Virginia. With a 2020 projected population of 1,067,000 Montgomery County is expected to add 139,800 persons or 13.1% by 2040.

Figure 1: Population 2000 to 2040, Montgomery County, Maryland



Source: <https://planning.maryland.gov/MSDC/Documents/county/mont.pdf>

Using the 2014 to 2018 U. S. Census American Community Survey 5-year average, Figure 2 shows the distribution of minority populations within Montgomery County.

<sup>1</sup> <https://www.census.gov/quickfacts/montgomerycountymaryland>



Figure 2: Montgomery County Minority Population Concentrations

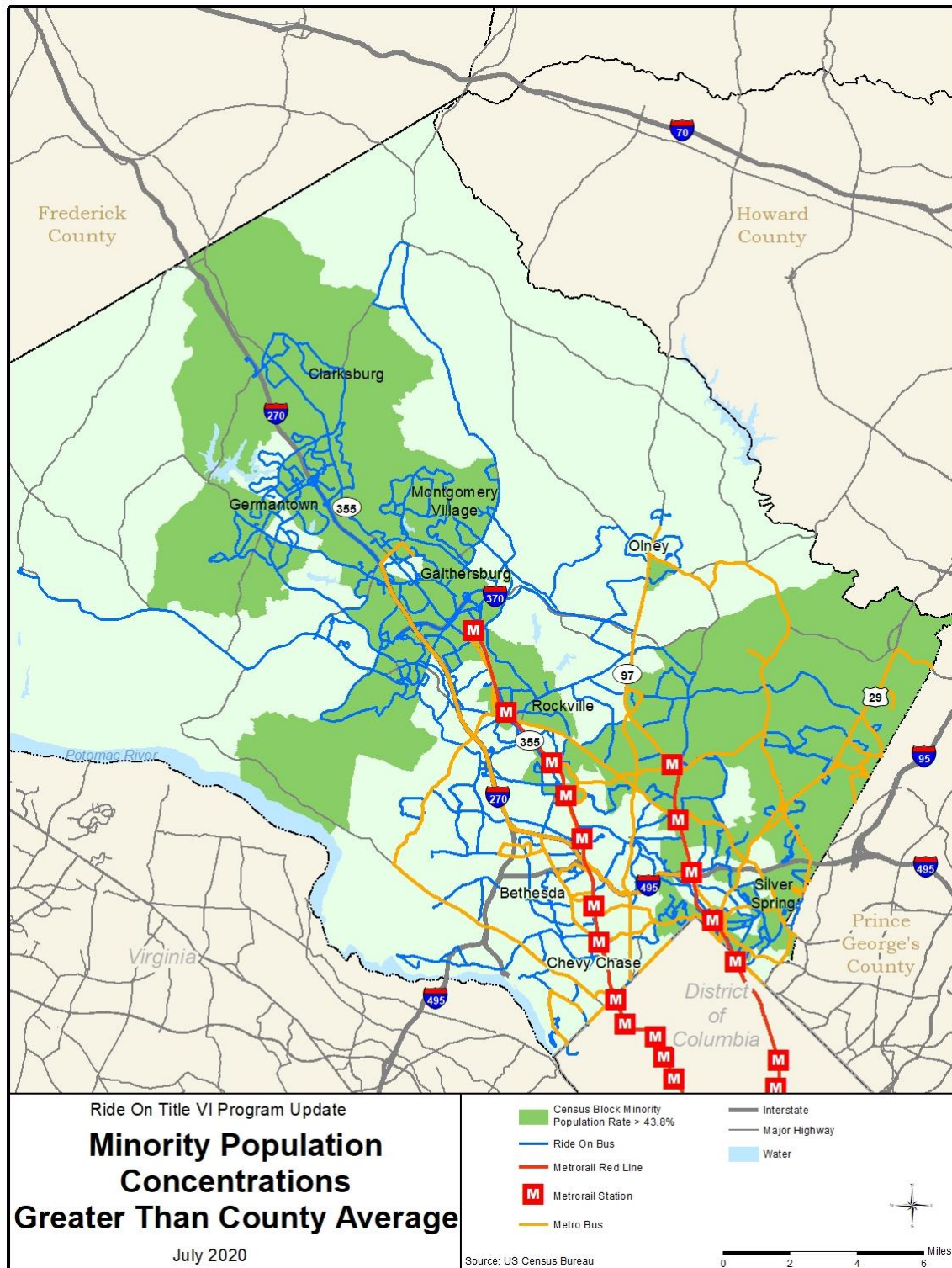
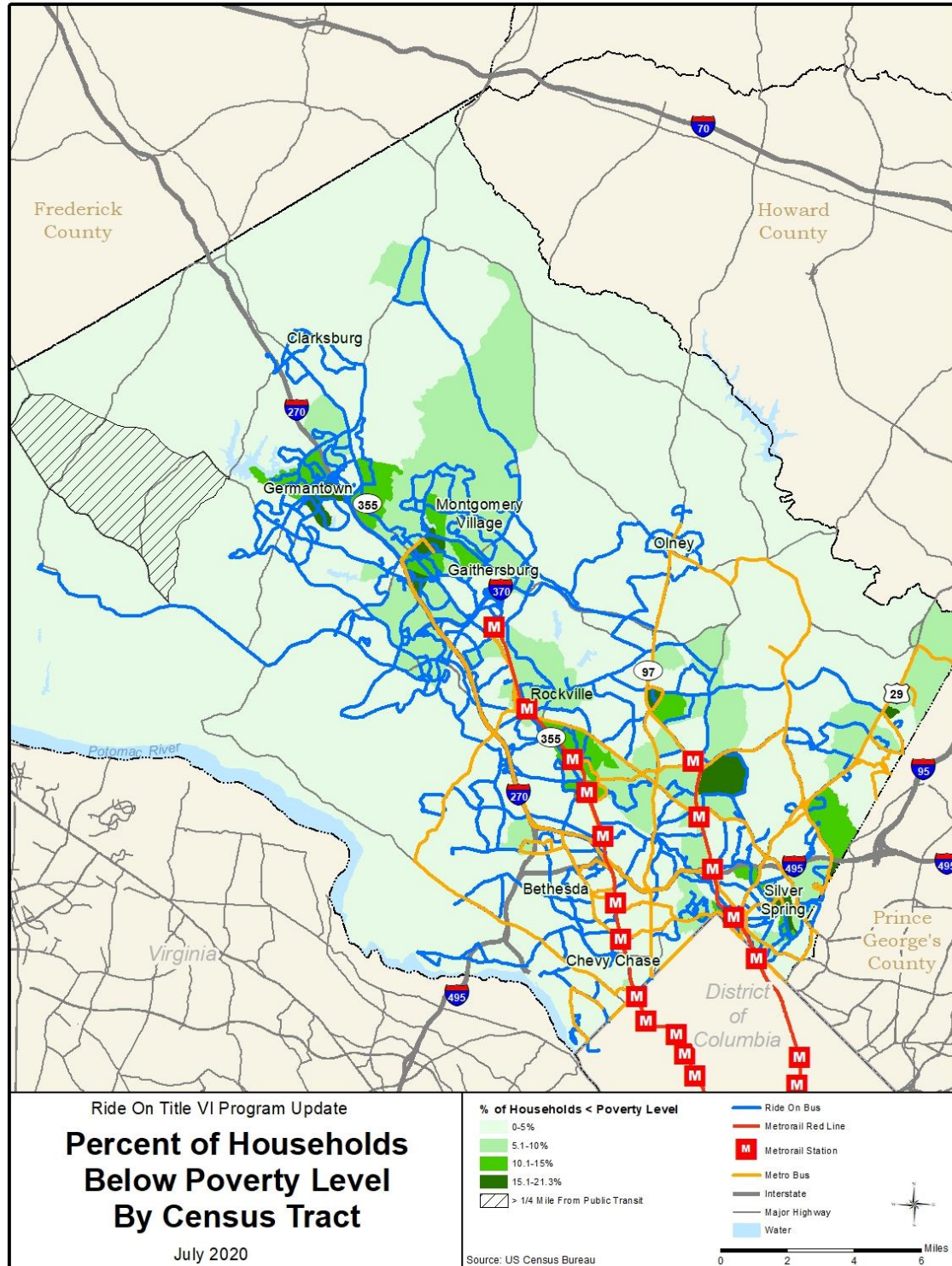




Figure 3 illustrates the low-income populations served by the Ride On and Metrobus transit services.

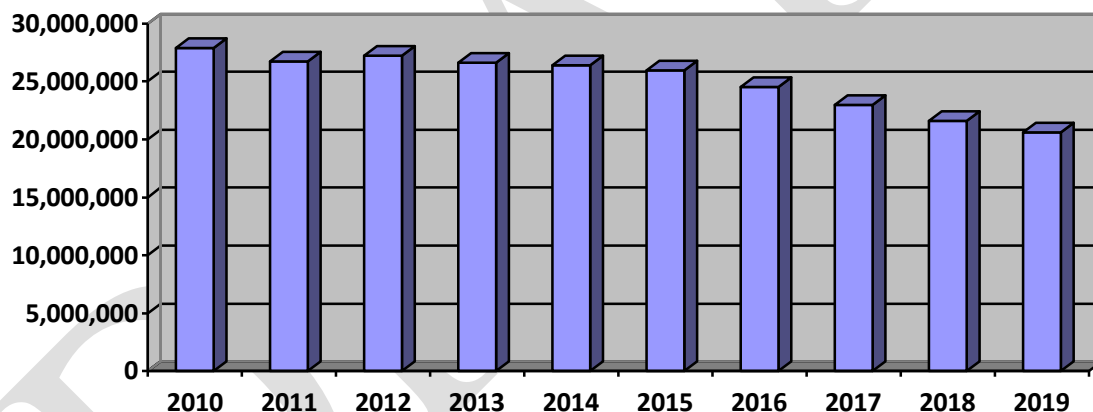
**Figure 3: Montgomery County Low Income Population Concentrations**



Public transportation in suburban Maryland is provided through partnerships between the Maryland Department of Transportation – Maryland Transit Administration (MDOT MTA), the Washington Metropolitan Transit Authority (WMATA) and local jurisdictions including Montgomery and Prince George’s counties. Montgomery County is served by multiple transit agencies. The Washington Metropolitan Transit Authority (WMATA) provides rapid rail service with the Red Line and local bus services on 18 bus lines. Through MDOT MTA, the MARC provides commuter rail services. The MDOT MTA Commuter Bus program also provides commuter bus services and Ride On provides local and express bus services.

The Ride On bus system is an integral part of the County’s infrastructure and resources. Ride On is the second largest bus operation in the state, next to Maryland Department of Transportation (MDOT) Maryland Transit Administration (MTA), and the second largest in the Washington Metropolitan Area. Since starting as a feeder bus service to Washington’s Metro, Ride On has grown to its current 307 peak vehicles on 79 different bus routes. During September 2019 Ride On operated 3,414 average weekday revenue hours and provided 80,743 average weekday passenger trips. Figure 4 shows Ride On unlinked passenger trips from fiscal year 2000 to fiscal year 2019.

Figure 4: Ride On Unlinked Passenger Trips 2010 to 2019



Source: National transit Database, 2018 Time Series Ride On Operating Data

Figure 5 illustrates the public transportation services in the County.

Major service changes and initiatives that have been undertaken since the Title VI Implementation Plan 2018 to 2020 include:

- The Ride On Extra - Route 101 - was added as a limited stop service along MD355 Rockville Pike. The service provides a faster service than local routes and is intended to relieve overcrowding on existing routes. The specially branded service operates at 10-minute frequencies during peak periods. The Extra has 13 stops with new branded shelters and was marketed as “Less Stop, More Go”





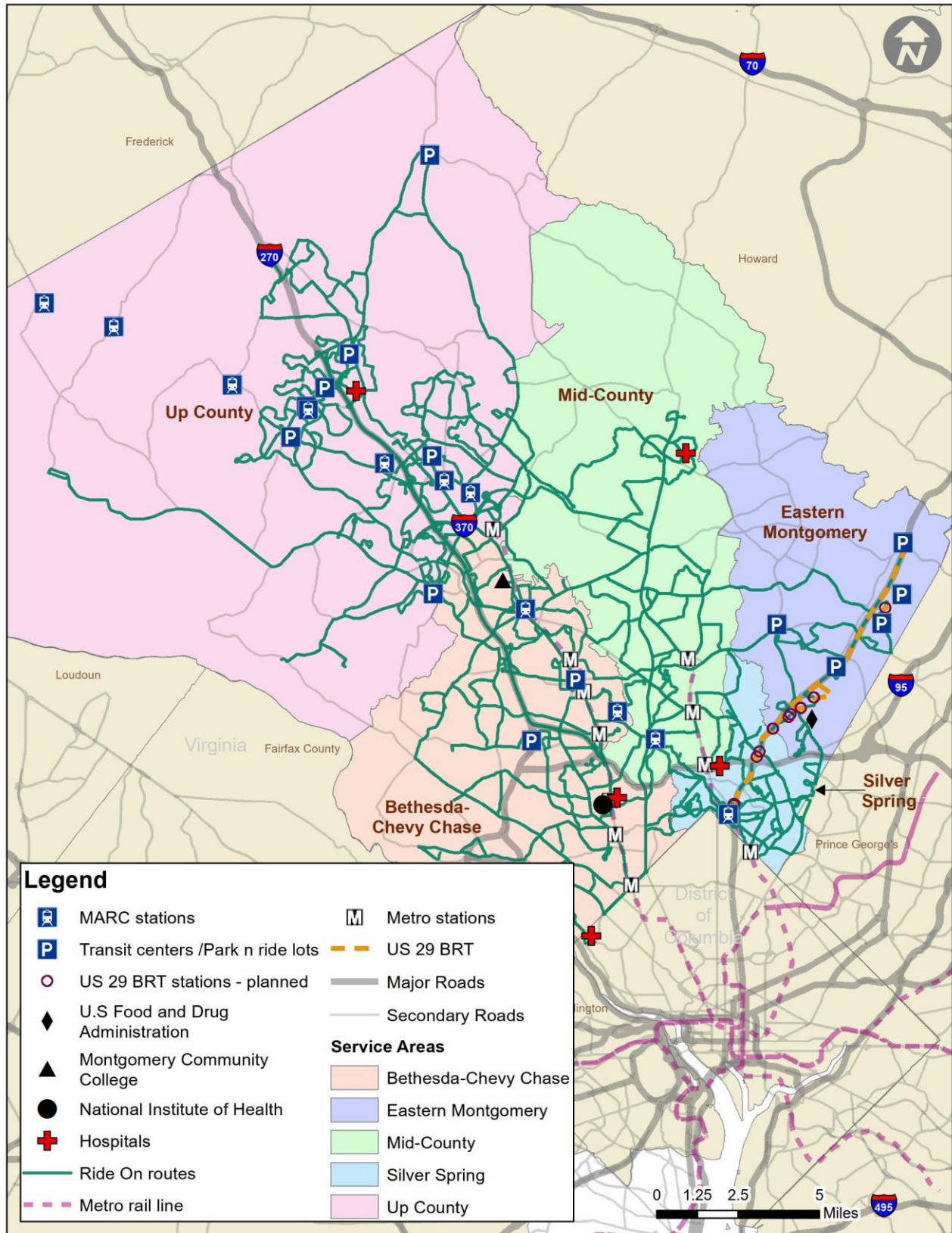
**Montgomery County, Maryland**  
**FY 2021-2023 Title VI Program Update**  
**July 2020**

- The US 29 Flash BRT received a \$10 million 2016 USDOT TIGER grant. As of FY21, the project with 18 new BRT station platforms and 16 sixty-foot articulated buses is budgeted to cost \$31.5 million. The project, delayed by Covid-19, is now expected to open in late 2020.
- The Ride On Route 129 was added as a limited stop service along US29 between Burtonsville and Silver Spring to grow ridership along the corridor in advance of the US29 Flash BRT. The service operates during peak periods with 15-minute frequencies.
- Four electric buses have been delivered with ten additional electric buses in the procurement process. Electric bus charging infrastructure has been added to the Silver Spring Depot. The first four electric buses will begin operations in late 2020 along Routes 18 and 25 in Takoma Park.
- Microtransit - As part of Montgomery County's vision to support improved multimodal transportation options, Montgomery County Department of Transportation (MCDOT) implemented its first pilot microtransit service in the summer of 2019.
- Kids Ride Free - The hours for Montgomery County's Kids Ride Free program was expanded from 2 to 8 PM to all day effective July 1, 2019.

DRAFT



Figure 5: Montgomery County Transit Services 2019



### III. POLICY STATEMENT AND AUTHORITIES

#### Title VI Policy Statement

**Montgomery County, Maryland** is committed to ensuring that no person shall, on the grounds of race, color, national origin, as provided by Title VI of the Civil Rights Act of 1964 and the Civil Rights Restoration Act of 1987 (PL 100.259), be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity, whether those programs and activities are federally funded or not.

**Montgomery County, Maryland's** Title VI Manager is responsible for initiating and monitoring Title VI activities, preparing required reports, and other responsibilities as required by Title 23 Code of Federal Regulations (CFR) Part 200, and Title 49 CFR Part 21.

---

Signature of Authorizing Official

---

Date

#### Authorities

Title VI of the 1964 Civil Rights Act provides that no person in the United States shall, on the grounds of race, color, national origin, or sex, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal financial assistance (refer to 49 CFR Part 21). The Civil Rights Restoration Act of 1987 broadened the scope of Title VI coverage by expanding the definition of the terms “programs or activities” to include all programs or activities of Federal Aid recipients, sub recipients, and contractors, whether such programs and activities are federally assisted or not.

Additional authorities and citations include: Title VI of the Civil Rights Act of 1964 (42 U.S.C. Section 2000d); Federal Transit Laws, as amended (49 U.S.C. Chapter 53 et seq.); Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C. 4601, et seq.); Department of Justice regulation, 28 CFR part 42, Subpart F, “Coordination of Enforcement of Nondiscrimination in Federally-Assisted Programs” (December 1, 1976, unless otherwise noted); U.S. DOT regulation, 49 CFR part 21, “Nondiscrimination in Federally-Assisted Programs of the Department of Transportation—Effectuation of Title VI of the Civil Rights Act of 1964” (June 18, 1970, unless otherwise noted); Joint FTA/Federal Highway Administration (FHWA) regulation, 23 CFR part 771, “Environmental Impact and Related Procedures” (August 28, 1987); Joint FTA/FHWA regulation, 23 CFR part 450 and 49 CFR part 613, “Planning Assistance and Standards,” (October 28, 1993, unless otherwise noted); U.S. DOT Order 5610.2, “U.S. DOT Order on Environmental Justice to Address Environmental Justice in Minority Populations and Low-Income Populations,” (April 15, 1997); U.S. DOT Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient Persons, (December 14, 2005), and Section 12 of FTA’s Master Agreement, FTA MA 13 (October 1, 2006).



**Annual Nondiscrimination Assurance to MTA**

As part of the Certifications and Assurances submitted each year to the MDOT MTA with the Annual Transportation Plan (ATP, the public transportation grant application) and all Federal Transit Administration grants submitted to the MDOT MTA, Montgomery County, Maryland submits a Nondiscrimination Assurance which addresses compliance with Title VI as well as nondiscrimination in hiring (EEO) and contracting (DBE), and nondiscrimination on the basis of disability (ADA).

The assurance for FY's 2021-2022 is attached as Appendix L. In signing and submitting this assurance, Montgomery County, Maryland confirms to MDOT MTA the agency's commitment to nondiscrimination and compliance with federal and state requirements.

DRAFT



#### **IV. ORGANIZATION**

Under the authority of the Montgomery County, Maryland's County Executive, the Transit Services Division Planning & Implementation Section, Senior Planner is responsible for ensuring implementation of the agency's Title VI program. Title VI program elements are interrelated and responsibilities may overlap. The specific areas of responsibility have been delineated below for purposes of clarity.

- Deanna Archey, Title VI Manager is responsible for coordinating the overall administration of the Title VI program, plan, and assurances, including complaint handling, data collection and reporting, annual review and updates, and internal education. Those responsible for overall administration coordinate with those responsible for public outreach and involvement and service planning and delivery.
- Will Kenlaw, Program Manager: Marketing, Advertising, & Customer Service is responsible for public outreach and involvement. This includes development and implementation of the Language Assistance Plan (LAP) plan. Those responsible for this area also coordinate with those who are responsible for service planning and delivery.
- Philip McLaughlin, Chief Operations Planning and Deanna Archey, Title VI Manager are responsible for service planning and delivery. This includes analysis of current services, analysis of proposed service and fare changes, and environmental justice. Those responsible for this area also coordinate with those who are responsible for service planning and delivery.

#### **V. OVERALL TITLE VI PROGRAM RESPONSIBILITIES**

Following are general Title VI responsibilities of the agency. The Title VI Manager is responsible for substantiating that these elements of the plan are appropriately implemented and maintained, and for coordinating with those responsible for public outreach and involvement and service planning and delivery.

##### **1. Data collection**

To ensure that Title VI reporting requirements are met, Montgomery County, Maryland maintains:

- A database of Title VI complaints received. The investigation of and response to each complaint is tracked within the database. A log of the public outreach and involvement activities undertaken to ensure that minority and low-income people had a meaningful access to these activities.

##### **2. Annual Report and Updates**

As a subrecipient providing service in a large urbanized area, Montgomery County, Maryland is required to notify MDOT MTA immediately when a Title VI complaint has





been received. Montgomery County, Maryland is also required to submit a report that documents any Title VI complaints on a quarterly basis as part of their quarterly Request for Reimbursement and an annual report to the MDOT MTA that documents any Title VI complaints received during the preceding 12 months, as well as a summary of the public outreach and involvement activities undertaken to ensure that minority and low-income people had a meaningful access to these activities.

The reporting form for the FY's 2021-2022 ATP is attached as Appendix M.

Further, Montgomery County, Maryland submits to MDOT MTA updates to any of the following items since the previous submission, or a statement to the effect that these items have not been changed since the previous submission, indicating date.

- No Title VI related compliance reviews were conducted during the prior three (3) years.
- Montgomery County, Maryland's Language Assistance Plan (LAP) Plan (Appendix E) has been updated as of July 2020.
- Montgomery County, Maryland's Public Participation Plan (PPP) (Appendix D) plan has been updated as of July 2020.
- Montgomery County, Maryland's procedures for tracking and investigating Title VI complaints has not changed.
- A list of Title VI investigations, complaints or lawsuits filed with the Montgomery County, Maryland's since the last submission (Appendix C).
- A copy of Montgomery County, Maryland's notice to the public that it complies with Title VI and instructions on how to file a discrimination complaint (Appendix A).

The annual Title VI report and updates are submitted to the MDOT MTA each year as part of the Annual Transportation Plan (ATP), or grant application submission.

### **3. Annual review of Title VI program**

Each year, in preparing for the Annual Report and Updates, the Title VI Manager will review the agency's Title VI program to assure implementation of the Title VI plan. Additionally, they will review agency operational guidelines and publications, including those for contractors, to verify that Title VI language and provisions are incorporated, as appropriate.

### **4. Dissemination of information related to the Title VI program**

Information on Montgomery County, Maryland's Title VI program is to be disseminated to agency employees, contractors, and beneficiaries, as well as to the public, as described in the "public outreach and involvement" section of this document, and in other





languages when needed according to the LAP plan as well as federal and State laws/regulations.

## **5. Resolution of complaints**

Any individual may exercise his or her right to file a complaint with Montgomery County, Maryland's if that person believes that s/he or any other program beneficiaries have been subjected to unequal treatment or discrimination in the receipt of benefits/services or prohibited by non-discrimination requirements. Montgomery County, Maryland will report the complaint to MDOT MTA within three (3) business days (per MDOT MTA requirements), and make a concerted effort to resolve complaints locally, using the agency's Title VI Complaint Form and Procedures, as described in Appendix B. All Title VI complaints and their resolution will be logged as described under "Data collection" and reported annually (in addition to immediately) to MDOT MTA.

## **6. Written policies and procedures**

Montgomery County, Maryland's Title VI policies and procedures are documented in this plan and its appendices and attachments. This plan will be updated periodically to incorporate changes and additional responsibilities that arise. During the course of item 3 above (annual Title VI review), the Title VI Manager will determine whether or not an update is needed.

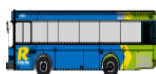
## **7. Internal education**

Montgomery County, Maryland's employees will receive training on Title VI policies and procedures upon hiring, and on an annual basis. This training will include:

- New hire - requirements of Title VI, and Montgomery County, Maryland's obligations under Title VI (LEP requirement included).
- Bus operators and operating supervisors - Annual refresher to be conducted at bus depots by safety and training staff concerning Title VI requirements including LEP.
- Administrative staff - annual refresher on Title VI requirements including data that must be gathered and maintained and how it relates to the Annual Report and Update to MDOT MTA.

In addition, training will be provided when any Title VI-related policies or procedures change (agency-wide training), or when appropriate in resolving a complaint (which may be for a specific individual or for the entire agency, depending the on the complaint).

## **8. Title VI clauses in contracts**



In all procurements using federal funds, Montgomery County, Maryland's contract will include the non-discrimination clauses attached as Appendix K. The Title VI Manager will work with the Starr Montout, Procurement Specialist.

### **Responsibilities of the Title VI Manager**

The Title VI Manager is responsible for supervising other staff assigned with Title VI responsibilities in implementing, monitoring, and reporting on Montgomery County, Maryland's compliance with Title VI regulations. In support of this, the Title VI Manager will:

- Identify, investigate, and eliminate discrimination when found to exist.
- Process Title VI complaints received by Montgomery County, Maryland, in accordance with the agency's Title VI Complaint Form and Procedures, as described in Appendix B.
- Meet with other staff assigned with Title VI responsibilities, including public outreach & involvement and service planning and delivery periodically to monitor and discuss progress, implementation, and compliance issues.
- Periodically review the agency's Title VI program to assess if administrative procedures are effective, staffing is appropriate, and adequate resources are available to ensure compliance.
- Work with other staff assigned with Title VI responsibilities, including public outreach & involvement and service planning and delivery to develop and submit the Annual Title VI Report and Update submitted to the MDOT MTA as part of the ATP to the MDOT MTA.
- Review the Annual Title VI Report and Update to determine the effectiveness of the Title VI program and related efforts.
- Review contract documents to ensure Title VI assurance language is included.
- If Montgomery County, Maryland receives a Title VI complaint about a contractor, work with the appropriate contract oversight staff and contractor to resolve the complaint and write a remedial action if necessary.
- Review important Title VI related issues with the County Executive as needed.
- Assess communications and public involvement strategies to ensure adequate participation of impacted Title VI protected groups and address additional language needs when needed according to the agency's LEP plan and federal and State laws/regulations.



## VI. PUBLIC OUTREACH AND INVOLVEMENT

Public outreach and involvement applies to and affects Montgomery County, Maryland's mission and work program as a whole, particularly agency efforts and responsibilities related to Montgomery County, Maryland's service planning. The Ride On Public Participation Plan (Appendix D) describes the County's public participation process which is to assure and improve access to the MCDOT Division of Transit Services decision-making process for low income, minority and limited English proficient (LEP) populations. In seeking public comment and review, Montgomery County, Maryland makes a concerted effort to reach all segments of the population, including people from minority and low-income communities, and organizations representing these and other protected classes. Montgomery County, Maryland utilizes a broad range of public outreach information and involvement opportunities, including a process for written comments, public meetings after effective notice, settings for open discussion, information services, and consideration of and response to public comments.

### Procedures for notifying the public of Title VI rights and how to file a complaint

Montgomery County, Maryland includes the following language on the agency's website, on posters on the interior of each vehicle operated in passenger service (English and Spanish) and the Ride On User Guide (English, Amharic, Chinese, French, Hindi, Korean, Spanish and Vietnamese):

"Montgomery County assures that no person shall, on the grounds of race, color, or national origin, as provided by Title VI of the Civil Rights Act of 1964 and the Civil Rights Act of 1987, be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity. For more information or to file a complaint, please contact the Montgomery County Office of Human Rights."

Instructions for filing Title VI complaints are posted on the agency's website and in posters on the interior of each vehicle operated in passenger service.

NON-DISCRIMINATION POLICY	POLÍTICA PARA COMBATIR LA DISCRIMINACIÓN
<p>We are committed to ensuring that no person is excluded from participation in or denied the benefits of the transit services we offer. This policy is consistent with the requirements of Title VI of the 1964 Civil Rights Act.</p> <p>If you believe you have been subjected to unequal treatment because of race, color, or national origin, then you have the right to file a formal complaint.</p> <p>Complaints must be filed within one hundred-eighty (180) days following the date of the alleged discriminatory action. For more information, or to file a complaint, you must submit it in writing directly to the following:</p>	<p>Nuestra agencia tiene un compromiso para asegurarse que ninguna persona sea excluida de la participación o se le nieguen los beneficios de transporte que ofrecemos. Esta política es consistente con los requisitos estipulados en El Título VI Del Acta De Los Derechos Civiles De 1964.</p> <p>Si usted cree que ha sido objeto de trato desigual debido a su raza, color o nacionalidad, entonces usted tiene el derecho de someter una querrela formal.</p> <p>Las querellas deben ser sometidas dentro de los ciento ochenta (180) días siguientes a la fecha que se alega se cometió la acción discriminatoria. Las querellas deben ser sometidas por escrito o por correo electronico al final de la pagina.</p>
<p><b>Montgomery County Office of Human Rights</b> 21 Maryland Avenue, Suite 330 Rockville, Maryland 20850 Telephone: 240.777.8450 Fax: 240.777.8460 - TTY: 240.777.8480 human-rights.commission@montgomerycountymd.gov</p> <p><b>Federal Transit Administration Office of Civil Rights</b> Attention: Title VI Program Coordinator East Building, 5th Floor-TCR 1200 New Jersey Ave. S.E. Washington DC 20590</p>	<p><b>Condado de Montgomery Oficina de Derechos Humanos</b> 21 Maryland Avenue, Suite 330 Rockville, Maryland 20850 Teléfono: 240.777.8450 Fax: 240.777.8460 - TTY: 240.777.8480 human-rights.commission@montgomerycountymd.gov</p> <p>Usted tiene que reportar a la Administración Federal de Tránsito a la siguiente dirección: <b>Oficina de Derechos Humanos</b> Atención: Título VI Program Coordinator East Building, 5th Floor-TCR 1200 New Jersey Ave. S.E. Washington DC 20590</p>



## **Procedures for handling and recording Title VI investigations/complaints/lawsuits**

Procedures for handling and recording Title VI complaints are attached as Appendix B.

Should any Title VI investigations be initiated by FTA or MDOT MTA, or any Title VI lawsuits be filed against Montgomery County, Maryland, the agency will follow these procedures:

Upon receipt of a Title VI Complaint Form, the Division of Transit Services Title VI Coordinator transmits a copy of the complaint form to MTA within three business days of receiving the completed complaint form. The Division of Transit Services Title VI Coordinator is responsible for maintaining a list of Title VI Complaints. The list shall include:

- a. Date received
- b. Type of Complaint (formal or informal)
- c. Complainant Name
- d. Contact Information
- e. Nature of Complaint
- f. Date Title VI Complaint Form received by the Office of Human Rights
- g. Response Date by the Office of Human Rights
- h. Description of the Decision by the Office of Human Rights
- i. Date of Decision by the Office of Human Rights

## **Strategies for Informing and Engaging Individuals with Limited English Proficiency (LEP)**

LEP is a term that defines any individual not proficient in the use of the English language. The establishment and operation of an LEP program meets objectives set forth in Title VI of the Civil Rights Act and Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency (LEP). This Executive Order requires federal agencies receiving financial assistance to address the needs of non-English speaking persons. The Executive Order also establishes compliance standards to ensure that the programs and activities that are provided by a transportation provider in English are accessible to LEP communities. This includes providing meaningful access to individuals who are limited in their use of English.

As required by MTA, Montgomery County, Maryland developed a written Language Assistance Plan (LAP), included as Appendix E. The LAP includes the required four factor analysis, evaluation of LEP data from the 2018 U.S. Census American Community Survey and 2018 on-board survey results and identification of language assistance measures employed by Montgomery County including translation of vital documents.



## **Public Outreach and Involvement Activities**

Montgomery County, Maryland has completed the Public Participation Plan, July 2020, (Appendix D) which describes the steps the County takes to ensure that minority, low-income, and LEP members of the community have meaningful access to public outreach and involvement activities, including those conducted as part of the planning process for proposed changes in services, fares, and facilities development.

The Public Participation Plan describes the public participation responsibilities of different Montgomery County offices, evaluates population demographics and survey data, outlines public participation activities and methods, and lists public participation events for FY17 to FY20.

## **VII. ENVIRONMENTAL JUSTICE (FOR ALL CONSTRUCTION PROJECTS)**

For new construction and major rehabilitation or renovation projects where National Environmental Policy Act (NEPA) documentation is required, Montgomery County, Maryland will integrate an environmental justice analysis into the NEPA documentation for submission to MDOT MTA. The environmental justice analysis includes:

- An identification of the low-income and minority communities within the study area affected by the project, and a discussion of the method used to identify this population (e.g., analysis of Census data, minority business directories, direct observation, a public involvements process, etc).
- For each of the identified low income or minority communities, a discussion of the adverse impacts of the project, both during and after its construction, such as:
  - Adverse effects on community cohesion or economic vitality by dividing or fracturing the community,
  - The isolation, exclusion, or separation of the community from the broader community,
  - Destruction or disruption of the availability of public and private facilities and services,
  - A change in employment opportunities,
  - Increased traffic in a residential area or decreased parking availability in a commercial area,
  - Air pollution, noise, vibration, change in storm water levels or flows, disturbance of contaminated soil or groundwater,
  - Disruption or destruction of man-made or natural resources such as parks, or Native American traditional cultural places,
  - Destruction or diminution of aesthetic or historic value, and
  - The cumulative effects of the above on the community.
- For each of the identified low income or minority communities, a discussion of all positive impacts such as an improvement in transit service, mobility, or accessibility.



- A description of all mitigation and environmental enhancement actions incorporated into the project to address the adverse impacts, including, but not limited to any special features of the relocation program that go beyond the requirements of the Uniform Relocation Act, to address adverse community impacts such as separation or cohesion issues and the replacement of the community resource destroyed by the project.
- A discussion of the remaining impacts, if any, and why further mitigation is not proposed.
- A comparison of mitigation and environmental enhancement actions implemented in conjunction with the project and affecting predominantly low-income and minority neighborhoods with mitigation implemented in conjunction with similar construction, renovation, or rehabilitation projects located in predominantly non-minority or non-low-income neighborhoods, or with segments of a corridor project that transverse non-minority and non-low-income neighborhoods.

The development of environmental justice analyses is the responsibility of the Title VI Program Manager.





## **VIII. URBANIZED AREA CHECKLIST**

FTA Circular 4702.1B requires providers of public transportation that operate 50 or more fixed route vehicles in peak service and are located in an urbanized area of 200,000 or more in population to complete the items listed in Table 1.

**Table 1: Urbanized Area Checklist**

<b>Provision</b>	<b>Circular Reference</b>	<b>Citation</b>	<b>Information to be included in the Title VI report</b>	<b>Location in Report</b>
Demographic Data Collection	Chapter V, Part 1	49 CFR 21.9(b);	Either demographic maps and charts prepared since the most recent decennial census, results of customer surveys that include demographic information, or demographic information on beneficiaries through locally developed procedure.	Figures 2 and 3 and tables and Public Participation Plan tables 3, 4, 5, 6, 7 and 8. Detailed demographic data by route is also included in the Title VI Survey Data Report, May 2019.
Service Standards	Chapter V, Part 2	49 CFR 21.5(b)(2); 49 CFR 21.5(b)(7); Appendix C to 49 CFR 21	System-wide service standards (such as standards for vehicle load, vehicle headway, distribution of transit amenities, on-time performance, transit availability, and transit security).	Appendix G - Title VI Policies
Service Policies	Chapter V, Part 3	49 CFR 21.5(b)(2); 49 CFR 21.5(b)(7); Appendix C to 49 CFR 21	System-wide policies (such as policies for vehicle assignment or transit security).	Appendix G - Title VI Policies
Equity Evaluation of Service and Fare Changes	Chapter V, Part 4	49 CFR 21.5(b)(2); 49CFR 21.5(b)(7); Appendix C to 49 CFR 21;	An analysis of the impacts on minority and low-income populations of any significant service and fare changes that occurred since the previous report was submitted.	Appendix I - Fare and Major Service Changes – 2018 to 2020
Monitoring	Chapter V, Part 5	49 CFR 21.5(b)(2); 49CFR 21.5(b)(7); Appendix C to 49 CFR 21;	The results of either level of service monitoring, quality of service monitoring, analysis of customer surveys, or locally developed monitoring procedure.	Appendix J - Title VI Monitoring Report



## IX. SERVICE DELIVERY AND PLANNING

Following the guidelines set forth by FTA Circular 4702.1B, Montgomery County, Maryland, monitors the performance of the transit system relative to system-wide service standards and service policies on a tri-annual basis. These monitoring activities documented in the Title VI Compliance Monitoring Report (Appendix J) are used to compare the level of service provided to predominantly minority areas with the level of service provided to predominantly non-minority areas to ensure that the result of policies and decision-making is equitable.

In addition to the Title VI Compliance Monitoring Report activities Montgomery County, Maryland has established procedures for equitable service delivery.

### **Procedures for ensuring equity in service provision**

**Vehicle Assignment:** Montgomery County, Maryland operates transit service from three bus depots. As of July 2020, the active fleet includes 354 buses with five different size of buses including 25' microtransit, 30' bus, 35' bus, 40' bus and 60' bus. The fleet includes a combination of fuel types including clean diesel, diesel hybrid, compressed natural gas (CNG) and electric. The transit services include regular route - full sized bus, regular route - small bus, Ride On Extra, Electric Bus, Flex Microtransit and Flash BRT.

Specialty fleets with unique livery are used on the Ride On Extra, Electric Bus, Microtransit, and Flash BRT. Because of the unique nature of each service the buses are assigned from subfleets comprised of a small number of buses.

For regular routes, buses are first assigned by size where full-sized 40' buses are assigned to routes with high passenger loads and small 30' buses are assigned to routes with lower ridership. In these categories buses are assigned randomly from each depot. In addition, Ride On uses a substantial amount of interlining where buses are used on multiple routes during the day. The combination of random bus assignment with interlining results in equitable bus assignments for low income and minority routes.

**Monitoring Title VI Complaints:** As part of the complaint handling procedure (Appendix B), the Title VI Manager investigates possible inequities in service delivery for the route(s) or service(s) about which the complaint was filed. Depending on the nature of the complaint, the review examines span of service (days and hours), frequency, routing directness, and interconnectivity with other routes. If inequities are discovered during this review, options for reducing the disparity are explored, and service or fare changes are planned if needed.

In addition to the investigation following an individual complaint, the Title VI Manager periodically reviews all complaints received to determine if there may be a pattern. At a minimum, this review is conducted as part of preparing the Quarterly and/or Annual Report and update for submission to the MDOT MTA.



## **Procedures for Ensuring Equity in Planning Service and Fare Changes**

Appendix G - Title VI Policies describes the standards and approval process for route and fare changes. With each planned service or fare change, Montgomery County, Maryland considers the relative impacts on, and benefits to, minority and low-income populations, including LEP populations. All planning efforts for changes to existing services or fares, as well as new services, have a goal of providing equitable service.

**The following steps are taken with each planning effort and documented in writing:**

1. Describe proposed changes and the rationale behind them.
2. Provide a list of modes (such as fixed-route or microtransit) the service changes would impact.
3. Describe the impacts of service changes on low-income and/or minority communities. In particular, establish why the proposed service would not have a disproportionately high and adverse effect on low-income and/or minority populations. Transit Planning Staff use Remix to collect latest available Census data and determine where low income and minority populations comprise the highest number and percent of the population and compare the location of these areas to the routes or service areas for which the changes are being considered.
4. Describe transit alternatives available to riders impacted by proposed changes.
5. Identify measures, if any, that would be taken to avoid, minimize, or mitigate any adverse effects of the service, or enhancements or offsetting, if any, that would be implemented in conjunction with the service.
6. Describe how the agency intends to reach out and involve minority and low-income populations to make sure their viewpoints are considered.
7. Determine whether it is necessary to disseminate information that is accessible to LEP persons (following the agency's LAP plan). If so, describe the steps that will be taken to provide information in languages other than English.

Steps 1 through 5 are the responsibility of the Chief Operations Planning.

Steps 6 and 7 are the responsibility of the Program Manager: Marketing, Advertising, & Customer Service.



## **X. APPENDICES**

### ***Appendix A – Title VI Assurances, Policy and Notice***

#### **DIVISION OF TRANSIT SERVICES STANDARD OPERATING PROCEDURE**

##### **Department of Transportation**

Section:  <b>Ride On</b>	Title:  <b>Title VI Assurances, Policy and Notice</b>	Date:  <b>December 1, 2014</b>
Number:	Division Chief Signature:	Page:  <b>1 of 2</b>

#### **Background:**

As a condition of receiving federal transit grants, Montgomery County is required to comply with Title VI of the Civil Rights Act of 1964 and Federal Transit Administration Circular 4702.1B. These regulations require that Montgomery County provide Title VI Assurances, approve a Title VI Policy, develop a Title VI Program and update it every three years, and Notify Beneficiaries of Protection Under Title VI.

#### **Title VI Assurances:**

Montgomery County executes annually the Federal Transit Administration Certifications and Assurances which contain the current Title VI assurances.

#### **Montgomery County Title VI Policy Statement**

Montgomery County does not discriminate on the basis of based on race, color, sex, marital status, religious creed, ancestry, national origin, disability, sexual orientation, or gender identity in places of public accommodation, which includes public transportation.

Any person(s) who believe that have been subjected to unequal treatment because of race, color, sex, marital status, religious creed, ancestry, national origin, disability, sexual orientation or gender identify may file a formal complaint. Complaints may be filed within one hundred-eighty (180) days following the date of discriminatory action. Complaints may be filed with the Montgomery County Office of Human Rights.

Chapter 27 of the Montgomery County Code (2004), as amended, provides for investigations of complaints of discrimination or discriminatory practices by the Montgomery County Office of Human Rights and prosecution of cases found to have merit. A copy of Chapter 27 is available online at:



[http://www.amlegal.com/nxt/gateway.dll?f=templates&fn=default.htm&vid=amlegal:montgomeryco\\_md\\_mc](http://www.amlegal.com/nxt/gateway.dll?f=templates&fn=default.htm&vid=amlegal:montgomeryco_md_mc).

### **Montgomery County Title VI Program**

The Montgomery County Department of Transportation, Division of Transit Service (DTS) is responsible for management of the transit operation including transit grants and compliance. In completing its responsibilities, DTS maintains the Ride On Title VI Program which is updated every three years as required by FTA regulations.

### **Notice to Beneficiaries**

Title 49 CFR Section 21.9(d) requires recipients to provide information to the public regarding the recipient's obligations under DOT's Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI. At a minimum, recipients shall disseminate this information to the public by posting a Title VI notice on the agency's website and in public areas of the agency's office(s), including the reception desk, meeting rooms, etc. Recipients should also post Title VI notices at stations or stops, and/or on transit vehicles.

Montgomery County fulfills this requirement by:

1. Posting the Montgomery County Title VI Policy Statement on its web site including:
  - a. A statement that the agency operates programs without regard to race, color, or national origin.
  - b. A description of the procedures that members of the public should follow in order to request additional information on the recipient's Title VI obligations.
  - c. A description of the procedures that members of the public shall follow in order to file a Title VI discrimination complaint against the recipient.
2. Placing the poster below on all Ride On transit buses, at Ride On offices and operating facilities and at key transfer stations. A list of the posting locations is maintained by the Ride On Civil Rights Coordinator.



**Montgomery County, Maryland**  
**FY 2021-2023 Title VI Program Update**  
**July 2020**

NON-DISCRIMINATION POLICY	POLÍTICA PARA COMBATIR LA DISCRIMINACIÓN
<p>We are committed to ensuring that no person is excluded from participation in or denied the benefits of the transit services we offer. This policy is consistent with the requirements of Title VI of the 1964 Civil Rights Act.</p> <p>If you believe you have been subjected to unequal treatment because of race, color, or national origin, then you have the right to file a formal complaint.</p> <p>Complaints must be filed within one hundred eighty (180) days following the date of the alleged discriminatory action. For more information, or to file a complaint, you must submit it in writing directly to the following:</p>	<p>Nuestra agencia tiene un compromiso para asegurarse que ninguna persona sea excluida de la participación o se le nieguen los beneficios de transporte que ofrecemos. Esta política es consistente con los requisitos estipulados en El Título VI Del Acta De Los Derechos Civiles De 1964.</p> <p>Si usted cree que ha sido objeto de trato desigual debido a su raza, color o nacionalidad, entonces usted tiene el derecho de someter una querrela formal.</p> <p>Las querellas deben ser sometidas dentro de los ciento ochenta (180) días siguientes a la fecha que se alega se cometió la acción discriminatoria. Las querellas deben ser sometidas por escrito o por correo electronico al final de la pagina.</p>
<p><b>Montgomery County Office of Human Rights</b> 21 Maryland Avenue, Suite 330 Rockville, Maryland 20850 Telephone: 240.777.8450 Fax: 240.777.8460 - TTY: 240.777.8480 human-rights.commission@montgomerycountymd.gov</p> <p><b>Federal Transit Administration Office of Civil Rights</b> Attention: Title VI Program Coordinator East Building, 5th Floor-TCR 1200 New Jersey Ave. S.E. Washington DC 20590</p>	<p><b>Condado de Montgomery Oficina de Derechos Humanos</b> 21 Maryland Avenue, Suite 330 Rockville, Maryland 20850 Teléfono: 240.777.8450 Fax: 240.777.8460 - TTY: 240.777.8480 human-rights.commission@montgomerycountymd.gov</p> <p>Usted tiene que reportar a la Administración Federal de Transito a la siguiente direccion:  <b>Oficina de Derechos Humanos</b> Atencion: Title VI Program Coordinatoe East Building, 5th Floor-TCR 1200 New Jersey Ave. S.E. Washington DC 20590</p>



## Appendix A – Title VI Notice Posting Locations

The Ride On Title VI notice has been posted at the following locations:

Montgomery County DOT, Division of Transit Services  
101 Monroe Street, 5th floor  
Rockville, Maryland 20850

Ride On Silver Spring Garage  
8710 Brookville Road  
Silver Spring, MD 20910

Ride On Nicholson Court Garage  
4925 Nicholson Court  
Kensington, MD 20895

David F. Bone Equipment Maintenance and Transit Operations Center (EMTOC)  
16840 Crabbs Branch Way  
Derwood, MD 20855

In addition to these posting locations, the notice has been placed on:

- 343 Ride On buses
- Montgomery County Department of Transportation web site at <http://www.montgomerycountymd.gov/DOT-Transit/titlevi.html>.
- Ride On Twitter account at: <https://twitter.com/RideOnMCT>.
- Ride On Facebook account at: <https://www.facebook.com/RideOnMCT/info>.
- Posted in 3 newspapers (English and Spanish)
- Email blast via GovDelivery system





***Appendix B – Title VI Complaint Procedures and Form***

**DIVISION OF TRANSIT SERVICES**

**STANDARD OPERATING POLICY & PROCEDURE**

**Department of Transportation**

Section:  <b>Ride On</b>	Title:  <b>Title VI Complaint Procedures</b>	Date:  <b>December 1, 2014</b>
Number:	Division Chief Signature:	Page:  <b>1 of 3</b>

**BACKGROUND:**

It is Montgomery County's policy that any allegation of discrimination or unequal treatment on the basis of race, color or national origin should be thoroughly investigated as described in the procedure below.

As a federal requirement Montgomery County will comply with Title VI of the Civil Rights Act of 1964 and Federal Transit Administration Circular 4702.1B. These regulations require that Montgomery County have a process for receiving Title IV complaints that may allege discrimination or unequal treatment on the basis of race, color, or national origin.

**PROCEDURE:**

Complaints alleging discrimination or unequal treatment on the basis of race, color or national origin (referred to as "Complaint" in this procedure) must be received within 180 days of the alleged discrimination and may be received in four ways including 1) Written and delivered to Montgomery County offices, 2) Telephonically through MC311, 3) Electronically through email, Facebook or Twitter, and 4) In person at Montgomery County Offices or at public meetings sponsored by Montgomery County. The investigation procedure for each method of receiving a Title VI Complaint follows:

**Written Complaints**

1. The written Complaint is forwarded to Office of Human Rights and the Division of Transit Services Title VI Coordinator.
2. If a Title VI Complaint Form has not been completed, a copy of the form is mailed to the Complainant.
3. The completed Title VI Complaint Form is mailed directory to the Office of Human Rights.



#### Telephone Complaints through MC311

1. Telephone Complaints are recorded in the Customer Service database.
2. The complainant is informed by the call taker that they may file a formal Title VI Complaint. If the complainant wants to file a formal Complaint they are referred to the website to download a Title VI Complaint Form or a Title VI Complaint Form is mailed to the complainant.
3. The completed Title VI Complaint Form is mailed directly to the Office of Human Rights. A copy of the Complaint as recorded in the Customer Service database is forwarded to the Division of Transit Services Title VI Coordinator.
4. If the caller does not wish to file a formal Title VI complaint, the Complaint is forwarded to Ride On Operations for normal processing. A copy of the Complaint as recorded in the Customer Service database is also forwarded to the Division of Transit Services Title VI Coordinator.

#### Electronic Complaints

1. Electronic complaints received through email, Facebook or Twitter are forwarded to the Division of Transit Services Title VI Coordinator.
2. The Division of Transit Services Civil Rights Coordinator replies to the electronic message and informs the complainant that they may file a formal Title VI Complaint as described at: <http://www.montgomerycountymd.gov/DOT-Transit/titlevi.html>.
3. The completed Title VI Complaint Form is mailed directly to the Office of Human Rights.

#### In-person Complaints

1. If a Complaint is made in person at a County office or at a public meeting, the County employee receiving the Complaint will record the contact information for the complainant and the nature of the Complaint. This information will be forwarded to the Division of Transit Services Title VI Rights Coordinator.
2. The Division of Transit Services Title VI Coordinator replies to the complainant and informs them that they may file a formal Title VI Complaint as described at: <http://www.montgomerycountymd.gov/DOT-Transit/titlevi.html>.
3. The completed Title VI Complaint Form is mailed directly to the Office of Human Rights.

#### Record of Complaints

Upon receipt of a Title VI Complaint Form, the Division of Transit Services Title VI Coordinator transmits a copy of the complaint form to MTA within three business days of receiving the completed complaint form. The Division of Transit Services Title VI Coordinator is responsible for maintaining a list of Title VI Complaints. The list shall include:

- j. Date received
- k. Type of Complaint (formal or informal)
- l. Complainant Name
- m. Contact Information



- n. Nature of Complaint
- o. Date Title VI Complaint Form received by the Office of Human Rights
- p. Response Date by the Office of Human Rights
- q. Description of the Decision by the Office of Human Rights
- r. Date of Decision by the Office of Human Rights

Complaint Investigation - Office of Human Rights

Once a Title VI Complaint Form is received by the Office of Human Rights it is assigned to an investigator. The investigator will contact the complainant in writing and/or by telephone. Additional information or clarification may be requested by the investigator.

Based upon receipt of all the information required, the Office of Human Rights will investigate a Title VI complaint within 90 days of receipt. The Office of Human Rights will provide a final response to the complainant, including notifying the complainant of his/her right to file a Complaint externally.

The Office of Human Rights will use its best efforts to respond to a Title VI complaint within 90 calendar days of its receipt of such complaint. Receipt of additional relevant information and/or simultaneous filing of Complaint with Montgomery County and an external entity may expand the timing of the Complaint resolution. Failure of the complainant to provide the requested information by a certain date may result in the administrative closure of the Complaint or a delay in Complaint resolution.

DRY



**TITLE VI COMPLAINT FORM**  
**Montgomery County Department of Transportation**  
**Division of Transit Services**

Montgomery County is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color or national origin, as provided by Title VI of the Civil Rights Act of 1964, as amended. The following information is necessary to assist us in processing your complaint. If you require any assistance in completing this form, please contact the Office of Human Rights Enforcement Manager by calling (240) 777-8450. The completed form must be returned to the Montgomery County Office of Human Rights, 21 Maryland Avenue, Suite 330, Rockville, MD 20850.

*(Please print)*

<b>Section I:</b>	
Name:	
Address:	
Telephone (Home):	Telephone (Work):
Electronic Mail Address:	
Accessible Format Requirement? <input checked="" type="radio"/> Large Print <input type="checkbox"/> Audio Tape <input type="checkbox"/> TDD <input type="checkbox"/> Other (specify)	

<b>Section II:</b>	
Are you filing this complaint on your own	<input checked="" type="radio"/> Yes* (if yes, go to Section III) <input type="checkbox"/> No
If not, please supply the name and relationship of the person for who you are filing the complaint.	
Please explain why you have filed for a third-party:	
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third-party.	<input checked="" type="radio"/> Yes <input type="checkbox"/> No

<b>Section III:</b>
I believe the discrimination I experienced was based on (check all that apply):
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin <input type="checkbox"/> Other (specify)
Date of the Alleged Discrimination (Month, Day, Year):
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person (s) who discriminated against you (if known) as well as names and contact information for any witnesses. If more space is needed, please use the back of

*Complete reverse side of form*



**Montgomery County, Maryland  
FY 2021-2023 Title VI Program Update  
July 2020**

[illegible]

<b>Section IV:</b>	
Have you previously filed a Title VI complaint with this agency? Please explain.	<input type="radio"/> Yes <input type="checkbox"/> No

<b>Section V:</b>	
Have you filed this complaint with any other Federal, State, or local agency or with any Federal or State	<input checked="" type="radio"/> Yes <input type="radio"/> No
If you have filed this complaint with another entity, please provide the information below:	
Agency:	Contact Name:
Address:	Telephone Number:

Agency:	Contact Name:
Address:	Telephone Number:

You may attach any written material or other information that you think is relevant to your complaint.

I affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

Complainant's Signature

Date \_\_\_\_\_

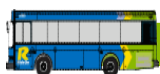
Please submit this complaint form to:  
Montgomery County Office of Human Rights, 21 Maryland Avenue, Suite 330, Rockville,  
MD 20850



***Appendix C – Description of Title VI Investigations, Lawsuits and Complaints***

During the period July 1, 2017 through June 30, 2020 the Montgomery County Department of Transportation, Division of Transit Services filed quarterly Title VI logs with the Maryland Department of Transportation Maryland Transit Administration. During the period there were no Title VI Investigations, Lawsuits and complaints.

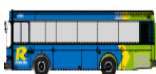
	<b>Date (Month, Day, Year)</b>	<b>Summary (include basis of complaint: race, color or national origin)</b>	<b>Status</b>	<b>Action(s) taken</b>
<b>Investigations</b>	<b>No investigations during the period July 1, 2017 to June 30, 2020</b>			
<b>1.</b>				
<b>Lawsuits</b>	<b>No lawsuits during the period July 1, 2017 to June 30, 2020</b>			
<b>1.</b>				
<b>Complaints</b>	<b>No complaints during the period July 1, 2017 to June 30, 2020</b>			
<b>1.</b>				





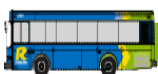
***Appendix D – Public Participation Plan***

DRAFT



***Appendix E – Language Assistance Plan***

DRAFT



## ***Appendix F – Minority Representation on Ride On Advisory Committees – July 2020***

Committee	Black or African American	White/ Caucasian	Latino/ Hispanic	American Indian or Alaska Native	Asian	Native Hawaiian or other Pacific Islander	Other <i>*Note</i>	Totals
Transit Advisory Group (TAG)	10	11	0	0	2	0	0	23
% of CAC Committee	43%	48%	0%	0%	9%	0%	0%	100%

*\*Note – Other races reported: African and Middle Eastern*

## ***Appendix G – Title VI Policies***

### **Montgomery County Title VI Policies**

Federal Transit Administration (FTA) Circular 4702.1B requires grantees that operate more than 50 peak hour vehicles establish Title VI policies providing:

- A. Definitions for Fare Change, Major Service Change, Disparate Impacts, Disproportionate Burdens and Minority Route;
- B. Service Standards for vehicle load, vehicle headway, on-time performance and service availability;
- C. Service Policies related to distribution of transit amenities and vehicle assignment; and,
- D. Approval procedures for Fare Changes and Major Service Changes

These Definitions, Service Standards, Service Policies and Approval Procedures must be approved by the County Council.

### **DEFINITIONS**

1. Fare Change - A Fare Change is any change in fare or new fare product regardless of the amount of increase or decrease. Except for the circumstances listed below, a Fare Equity Analysis is required for any Fare Change to evaluate the effects of a Fare Change on low-income and Title VI-protected populations.

#### Exceptions.

- i. “Give and Ride” and/or special events where Montgomery County has decided that all passengers ride free.



- ii. Temporary fare reductions that are mitigating measures for other actions such as free or reduced fare due to construction activities.
  - iii. Promotional fare reductions that last less than six months.
2. Major Service Change - A Major Service Change is any new route or a reduction or increase in a route's revenue vehicle hours greater than 25% of the prior schedule's revenue vehicle hours. A Service Change Equity Analysis is required for any Major Service Change to evaluate the effects of the proposed service change on low-income and Title VI-protected populations.
  3. Disparate Impact - For Major Service Changes, a disparate impact may exist when the minority population adversely affected by a Major Service Change is twenty percent (20%) more than non-minority population adversely affected by the Major Service Change. For a Fare Change, a disparate impact may exist if the difference between the average fare increase (represented as a % change) for minority populations and the average fare increase (represented as a % change) for non-minority populations is greater than 5% (percentage points). For example, if the average fare increase on minority riders was 10% and the average fare increase on non-minority riders was 4%, the difference is greater than 5% and would be considered disparate.
  4. Disproportionate Burden - For Major Service Changes, a disproportionate burden may exist when the low income population adversely affected by a Major Service Change is twenty percent (20%) more than non-low income population adversely affected by the Major Service Change. For a Fare Change, a disproportionate burden may exist if the difference between the average fare increase (represented as a % change) for low-income populations and the average fare increase (represented as a % change) for non-low income populations is greater than 5% (percentage points). For example, if the average fare increase on low income riders was 10% and the average fare increase on non-low income riders was 4%, the difference is greater than 5% and would be considered disproportionate.
  5. Minority Route - A Minority Route is a route that serves an area with a population with a higher percentage of minorities than the Montgomery County average as determined by the most recent and available US Census. Using Geographic Information Systems (GIS), the total population and minority population residing within ¼ of a mile of a bus route are tabulated except for express routes where the service area is 1 mile from the park and ride lot or transfer center.



### **SERVICE STANDARDS**

<b>Standard</b>	<b>Definition</b>	<b>Calculation</b>
Vehicle Load	Average ratio of passengers per seat per bus during a service hour at the maximum load point	Peak period maximum load factor of 1.2 on regular routes and 1.0 on express routes. Off-peak service maximum load factors of 1.0 on all service types.
Headway	Maximum scheduled time interval between buses	Maximum 30 minutes peak headway during peak and off-peak periods.
Schedule Adherence	Percent adherence to scheduled service.	Goal 85 % on time performance for delivered trips, difference between scheduled time and actual time arriving at a time point based on a window of no more than 2 minutes early or 7 minutes late.
Service Coverage	Traffic Analysis Zones (TAZ) that have 3+ households per acre and/or 4+ jobs per acre are served by Ride On and / or Metro Bus routes.	Using the most recent data, TAZs meeting the threshold are analyzed for the presence of Ride On and / or Metro Bus service.

### **SERVICE POLICIES**

<b>Service Policy</b>	<b>Montgomery County Policy</b>
Vehicle Assignment	Vehicles are assigned to routes based on ridership demands, road conditions, service type, and maintenance garage capacity and vehicle technologies (e.g., CNG fueling only provided at EMTOC).
Distribution of Transit Amenities	Ride On will equitably provide amenities such as shelters and kneewalls at bus stops where Ride On has decision-making authority.

### **APPROVAL PROCEDURES**

1. Fare Change - The Division of Transit Services Office of Planning and Implementation will be responsible for completing the Fare Change Equity Analysis and the Division of Transit Services Marketing Office will be responsible for conducting and documenting the public involvement activities. Upon completion of the Fare Change Equity Analysis



and the required public involvement, the Montgomery County Council will follow its procedures in reviewing and approving the Fare Change. The County's public meetings conducted as part of the overall budget approval process will provide the public involvement activities required for fare change proposals that are considered as a part of the Council's annual budget. Additional public meetings may be conducted by the Montgomery County Council.

2. Major Service Change – The Division of Transit Services Office of Planning and Implementation is responsible for developing service changes and will identify any service change that meets the definition of Major Service Change. For each Major Service Change, the Division of Transit Services Office of Service Planning will complete a Major Service Change Equity Analysis. The Division of Transit Services Marketing Office will conduct and document the public involvement required for Major Service Changes consistent with Ride On's Public Participation Plan. Upon completion of the Major Service Change Equity Analysis and the required public involvement, the Montgomery County Council will follow its procedures in reviewing and approving the Major Service Change. The County's public meetings conducted as part of the overall budget approval process will provide the public involvement activities required for Major Service change proposals that are considered as a part of the Council's annual budget. Additional public meetings may be conducted by the Montgomery County Council.

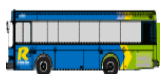




## *Appendix H – Title VI Policies Summary of Public Involvement Activities*

### PUBLIC OUTREACH AND INVOLVEMENT ACTIVITIES

Meetings/Event	Locations	Date & Time	Attendees (approximate)
<b>FY17</b>			
Note: Highlighted cells included event interpreters			
Customer Appreciation Day	Forest Glen Metro Station	July 23; 4:30-6:30	200
<b>Tobytown Service Public Forum</b>	Travileh Elementary School	July 28	25
MC Agricultural Fair	Booth on Main Street	August 8-18	2000
Silver Spring Citizens Advisory Group	Silver Spring Civic Building	August 24; 7-8 pm	40
Customer Appreciation Day	Grosvenor Metro Station	August 26; 4:30-6:30	300
Christ Episcopal School	sent collateral materials	August 27; 9-10 am	25
Victory Christian Church International (African/African American) August 26th, 30 people	staffed table at their Community Day	August 26; 6-8 pm	50
Seneca Valley School Cluster Day	Back-To-School Fair	August 27; 10 am - 2 pm	300
Customer Appreciation Day	Twinbrook Metro Station	August 26; 4:30-6:30	500
Customer Appreciation Day	Lakeforest Transit Center	September 22; 4:30-6:30	300
Route 301 Soft Launch	Tobytown Community Center	October 2; 7 am - Noon	30
Customer Appreciation Day	Germantown Transit Center	October 27; 4:30-6:30	300
Youth Transitioning Fair	Takoma Park	October 8; 2-14 pm	75
Impact Silver Spring Meeting	East County Community Center	October 27; 10-11 am	10
East County Community Village Senior Citizens meeting	East County Community Center	November 7; 7-8 pm	15
<b>Rte 33 Public Forum</b>	Highland Elementary School	March 2	40
<b>Clarksburg new route/changes Public Forum</b>	Rocky Hill Middle School	March 7	25



**Montgomery County, Maryland**  
**FY 2021-2023 Title VI Program Update**  
**July 2020**

Meetings/Event	Locations	Date & Time	Attendees (approximate)
Rte 31 Public Forum for Popular Run	Poplar Run Community Center	March 9	35
Ride On extRa soft launch	Medical Ctr Metro Station	April 10th; 4:30-6:30 pm	150
Ride On extRa soft launch	Lakeforest Transit Ctr	April 11th; 4:30-6:30 pm	150
Give And Ride	On All Buses	April 19-25; all hours of service	6000
Bike To Work Day	Dawson's Market, Rockville	May 19; 6-9 am	100
GreenFest	Bohrer Park, Gaithersburg	May 6th; 10 am - 4 pm	300
Ride On extRa Public Forum	Executive Office Building	May 24	25
Customer Appreciation Day	White Oak Transit Center	June 29; 4:30-6:30 pm	300
<b>FY18</b>			
Bethesda/Chevy Chase RSC CAB	Bethesda Regional Services Ctr	July 6; 8-9 pm	25
RO extRa outreach	Bethesda office building	July 11; 1-3 pm	75
Transportation Options for Mentally Disabled Persons	Center for Behavioral Health	July 11; 1-3 pm	11
UpCounty RSC CAB meeting	Germantown Regional Svcs Ctr	July 17; 7-9 pm	30
Bethesda TMD/BUP meeting	Bethesda Urban Partnership office	July 21; 8-9 am	15
NIH Transportation Team meeting	NIH Building 31	July 25; 9:30-11 am	10
Transit Advisory Group meeting	Executive Office Building	July 27; 6-8 pm	15
Ride On extRa Outreach	Bethesda Metro Station	August 1; 3-7 pm	300
Ride On extRa Outreach	Medical Center Metro Station	August 2; 3:30 - 7:30 pm	200
Ride On extRa Outreach	Rockville Metro Station	August 3; 4-7 pm	250
Ride On extRa Outreach	Lakeforest Transit Center	August 4; 5:30 - 9:30 am	300
Ride On extRa Outreach	Medical Center Metro Station	August 7; 3:30 - 7:30 pm	200
Ride On extRa Outreach	Shady Grove Metro Station	August 8; 5:30 - 9:30 am	250



**Montgomery County, Maryland**  
**FY 2021-2023 Title VI Program Update**  
**July 2020**

<b>Meetings/Event</b>	<b>Locations</b>	<b>Date &amp; Time</b>	<b>Attendees (approximate)</b>
Ride On extRa Outreach	Twinbrook Metro Station	August 10; 4-7 pm	200
Booth at County Ag Fair	Montgomery County Fair	August 11-19; Every Day	5000
Ride On extRa Outreach	Route 124 Park & Ride	August 15; 4-7 pm	150
Ride On extRa Outreach	Lakeforest Transit Center	August 21; 5:30 - 9:30 am	200
Ride On extRa Outreach	Montgomery College	August 22; 7-11 am	125
Ride On extRa Outreach	White Flint Metro Station	August 24; 4-7 pm	150
Ride On extRa Outreach	Seneca Valley Back-To- School Day	August 26; 10 am - 2 pm	200
Ride On extRa Outreach	Grosvenor Metro Station	August 28; 4-7 pm	150
Ride On extRa Outreach	Route 124 Park & Ride	August 29; 6-8 am	100
Ride On extRa Outreach	Montgomery County Council	September 5; 7 - 7:30 pm	20
Ride On extRa Outreach	Lakeforest Transit Center	September 6; 5:30 - 9:30 am	15
Ride On extRa Outreach	Medical Center Metro Station	September 7; 3:30 - 7:30 pm	100
Ride On extRa Outreach	Rockville City Council	September 11; 7- 7:30 pm	20
Ride On extRa Outreach	Friendship Heights TMD	September 12; 10- 10:30 am	20
Ride On extRa Outreach	NIH Transportation Day	September 12; 12-2 pm	150
Ride On extRa Outreach	Shady Grove Metro Station	September 13; 5:30 - 9:30 am	250
Ride On extRa Outreach	Richard Montgomery High School	September 15; 11- Noon	500
Ride On extRa Outreach	Silver Spring TMD	September 14; 8:30 - 9:30 am	20
Ride On extRa Outreach	Gaithersburg City Council	September 18; 7- 7:30 pm	20
Ride On extRa Outreach	Lakeforest Transit Center	September 19; 3:30 - 7:30 pm	250
Ride On extRa Outreach	Gaithersburg High School	September 20; 11- Noon	700



**Montgomery County, Maryland**  
**FY 2021-2023 Title VI Program Update**  
**July 2020**

<b>Meetings/Event</b>	<b>Locations</b>	<b>Date &amp; Time</b>	<b>Attendees (approximate)</b>
Ride On extRa Outreach	Rockville Metro Station	September 21; 5:30 - 9:30 am	200
Ride On extRa Outreach	Bethesda Naval Walter Reed	September 21; 5:30 - 9:30 am	200
Ride On extRa Outreach	Medical Center Metro Station	September 22; 6-10 am	200
Ride On extRa Outreach	Montgomery College	September 26; 4:30 - 7:30 pm	150
Ride On extRa Outreach	Route 124 Park & Ride	September 28; 4-7 pm	100
Ride On extRa Outreach	Media Event at Lakeforest Transit Center	October 2; 1-2 pm	100
Ride On extRa Outreach	Kentlands OctoberFest	October 8; Noon - 5 pm	150
<b>Route 129 Public Forum</b>	East County Regional Service Center	November 29	25
Give And Ride	On All Buses	April 15-21	6,000
Bike To Work Day	Dawson's Market, Rockville	May 18; 6-9 am	75
GreenFest	Montgomery College Takoma Park	May 5; 10 am - 3 pm	250
Customer Appreciation Day	Lakeforest Transit Center	May 15; 4:30 - 6:30 pm	300
<b>FY19</b>			
Customer Appreciation Day	Bethesda Metro Station	July 31	200
Customer Appreciation Day	Rockville Metro Station	October 39	250
<b>Route 75 Public Forum</b>	Up County Regional Service Center	November 1	10
<b>Public Forum for Route 52</b>	Ross Body Community Center	November 19	4
Flex Outreach Efforts:			
**Focus Group I – Glenmont/Wheaton Community	Wheaton Library/Rescue Station	January 28	6
**Focus Group II – Rockville/Wheaton/Glenmont Communities; 8 attendees; February 11	Executive Office Building	February 11	8
**Commission on Aging – 11	CoA Offices	March 12	11



**Montgomery County, Maryland**  
**FY 2021-2023 Title VI Program Update**  
**July 2020**

Meetings/Event	Locations	Date & Time	Attendees (approximate)
attendees; March 12			
**Transit Advisory Group – 12 attendees; March 19	Executive Office Building	March 19	12
**COG committee – 14 attendees; April 23	Council of Governments Building	April 23	14
<b>**Public Forum</b>	Mario Loiederman Middle School	April 25	23
Give And Ride	On All Buses	April 21-27; all hours of service	5500
GreenFest	Brookside Gardens	April 28	200
**Commission on Disabilities – 22 attendees	Executive Office Building	May 8	22
**Glenmont Forest Neighbors Civic Association	Highland Elementary School	May 13	50
Bike To Work Day	Dawson's Market, Rockville	May 19; 6-9 am	100
Customer Appreciation Day	Takoma Metro Station	June 18	100
**CE's Age-Friendly Montgomery Advisory Workgroup	Executive Office Building	June 19	22
<b>FY20</b>			
MC Ag Fair	County Fairgrounds	August 9-17	2500
MCPS Back-To-School Fair	Westfield Wheaton Mall	August 24	2000
<b>FLEX EVENTS</b>			
Flex Launch Events	Rockville Town Square	June 26	100
Flex Launch Events	Westfield Wheaton Mall	June 26	200
Flex Launch Events	Westfield Wheaton Mall	July 20	150
**Friendship Heights TMD July 9 - 12 ppl	Friendship Heights Community Ctr	July 9 - 12 ppl	12
**Silver Spring TMD July 11 - 20 ppl	Discovery Communications Bldg	July 11 - 20 ppl	20
**Bel Pre Community Association	Bel Pre Swim Center	July 11	1
Flex & Kids Ride Free Outreach	Richard Montgomery High School	September	500
Flex & Kids Ride Free Outreach	Wheaton High School	September	200
Flex & Kids Ride Free Outreach	Thomas Edison High School	September	200
Customer Appreciation Day	Silver Spring Transit Center	July 29	100



**Montgomery County, Maryland**  
**FY 2021-2023 Title VI Program Update**  
**July 2020**

<b>Meetings/Event</b>	<b>Locations</b>	<b>Date &amp; Time</b>	<b>Attendees (approximate)</b>
Montgomery County Council of PTA Presidents Annual Meeting	Blake High School	September	200
Customer Appreciation Day	Forest Glen Metro Station	September	100
National Institutes of Health Commuter Day	Rockledge Drive Campus	September	100
MCPS/MCCPTA Kids Ride Free Outreach	Norwood High School	October	40
NIH Clinical Research Ctr Transportation Day	Clinical Sciences Building Lobby	October 22	200
Clarksburg Public Forum	Rocky Hill Middle School	December 12	40
US 29 Route Restructuring Workshop for the FLASH	Blair High School	January 27	74
US 29 Route Restructuring Workshop for the FLASH	East County Regional Services Center	January 29	25





***Appendix I – Fare and Major Service Changes – 2018 to 2020***

Routes	Unit	Change	Year	Description	Major Service Change
Running Time	Scheduling	Scheduling	FY18	77 Schedules	
Span	Scheduling	Scheduling	FY18	10 Schedules	
Frequency	Scheduling	Scheduling	FY18	13 Schedules	
3	Planning	Eliminate	FY18	Elim Wkdy	x
93	Planning	Eliminate	FY18	Elim Wkdy	x
94	Planning	Eliminate	FY18	Elim Wkdy	x
5,26,81	Plan/Sched	Executive Connector	FY18	Executive Blvd	
101	Planning	New	FY18	Ride On Extra 355	x
129	Planning	New	FY18	Limited Stop US29	x
Running Time	Scheduling	Scheduling	FY19	71 Schedules	
Span	Scheduling	Scheduling	FY19	13 Schedules	
Frequency	Scheduling	Scheduling	FY19	10 Schedules	
Purple Line	Plan/Sched	Temp Restructure	FY19	SSTC Construction	
43	Planning	New	FY19	New Sunday	
63	Scheduling	New Midday	FY19	Extend all trips Gaither Rd	
75	Planning	Extension	FY19	Ext to MARC, reroute in Clrk	x
52	Planning	Extension	FY19	Ext to Good Counsel	
76	Planning	New	FY19	New Saturday	
90	Planning	Extension	FY19	Milestone	
101	Plan/Sched	New Stop	FY19	Templeton	
Rock Spring	Planning	Eliminate	FY19	Elim Wkdy	
Flex	Planning	Demand Response	FY19	On demand within 2 zones	x
All	Planning	Youth Fares	FY20	Expand hours for Kids Ride Free Program	x
Running Time	Scheduling	Scheduling	FY20	55 Schedules	thru Jan 2020
Span	Scheduling	Scheduling	FY20	9 Schedules	thru Jan 2020
Frequency	Scheduling	Scheduling	FY20	26 Schedules	thru Jan 2020
26,38,59	Scheduling	Scheduling	FY20	Peak period cuts	
18-25	Scheduling	Electric buses	FY20	Select blocks electric buses	



***Appendix J - Title VI Monitoring Report***

DRAFT



***Appendix K - Non-discrimination Contract Clauses***

DRAFT



***Appendix L - FY21-22 Annual Transportation Plan Assurance***

DRAFT



***Appendix M - FY21-22 Annual Transportation Plan Reporting Form***

DRAFT



***Appendix N - Montgomery County Council Approval***

DRAFT

